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August 13, 2021

By ECF

The Honorable Gabriel W. Gorenstein

United States Magistrate Judge

Southern District of New York

500 Pearl Street

New York, New York 10007

MEMORANDUM
ENDORSEMENT

Re: *Dooley v United States*, No. 18-cv-7136 (GWG)

Dear Judge Gorenstein:

We represent the Plaintiff, Kevin Dooley in the above mentioned action as against the USA under the Federal Tort Claims Act. I am writing to request an extension of time until August 16, 2021 for the deadline for the submission our pretrial motions *in limine* required by this Court in their April 15, 2021 Order (Dkt. No. 71). This request is pursuant to Rules 1B and 1E of the Court's Individual Practices.

The reasons for said request are several, the first being that I misunderstood your order and I was alerted to my misunderstanding by defense counsels, Danielle Levine and Jennifer Jude, which I greatly appreciated. My misunderstanding occurred in the midst of moving our office and my wrenching my back with constant muscle spasms. I have a herniated disc which was aggravated by my lifting boxes which required medication.

I sincerely apologize for my error. I also apologize for my failure to conform to the Court rules for the form of our motions in the first instance.

Defense counsel kindly has agreed to this request for an extension.

We thank the Court for its time and consideration of this request.

Respectfully

Michael J. Aviles & Associates


By: RAYMOND A. RASKIN
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CC: Danielle Levine (via ECF)

The deadline for plaintiff to file his trial memorandum of law (which may include applications for rulings in limine) is extended to August 16, 2021.

SO ORDERED.
Dated: August 13, 2021



GABRIEL W. CORENSTEIN
United States Magistrate Judge